

**Submission to the Local Government and Environment Select Committee on the
Supplementary Order Paper no. 150 proposing amendments to the
Waste Minimisation (Solids) Bill**

NCWNZ is an umbrella organisation representing 46 Nationally Organised Societies and National Members. It has 28 Branches throughout the country attended by representatives of those societies and some 150 other societies. It also has three satellite groups and three regional consultation groups. NCWNZ is representative of approximately 350,000 women, via its affiliated bodies. The Council's functions are to serve women, the family and the community at local, national and international levels through research, study, discussion and action. NCWNZ welcomes the opportunity to consider this Bill.

This submission is a collation of opinion from NCWNZ members from several different parts of the country. Many speak of their experiences with local waste management authorities, and of the initiatives taken by local businesses both in dealing with their own waste, and in managing the waste of others.

General comments

As was stated in the NCWNZ submission of August 2006 on the original bill, the Council has for very many years had a strong interest in waste management, and has been supportive of many initiatives intended to reduce waste, by reduction, re-use or recycling. NCWNZ recognises that many local governments and businesses have already introduced programmes that encourage and enable the public to dispose of waste materials in ways that allows them to be re-used or recycled, and commends them for this work. Several NCWNZ respondents cited examples of initiatives undertaken by their local authorities, often in developing partnerships with local waste management businesses that result in very low use of the landfill as a final resting place for some intractable products.

NCWNZ's policy supports the concepts of zero waste and waste minimisation and actively works to promote these concepts.

Specific comments

Part 2 Product Stewardship

Clause 7 Declaration of priority products

In addition to the three classes identified in sub clause (2) where "The Minister may make the declaration", NCWNZ suggests there might be a further class (d) of products that may or do cause significant environmental harm not only at the end of their lives but in the course of their use. This new class would include some detergents and cleaning materials, and some personal cleansing and hygiene products that cause considerable water pollution, and for which less harmful alternatives exist and are usually readily available.

NCWNZ respondents specifically list the following products as needing to be treated as priorities:

used oil,	treated timber,	paint products,
computers and associated equipment,	batteries,	disposable nappies,
mobile phones,	agricultural chemicals,	plastic silage wrap,
whiteware,	fluorescent light tubes and light bulbs,	old building waste.

We know that many schemes already exist for dealing with these products, but there must be a national requirement that all of them are captured and dealt with appropriately. Monitoring must occur to ensure that collecting used equipment for disposal elsewhere does not result in environmental damage in the designated place of disposal. Relocating our problem is not an acceptable solution.

It is important to prioritise products according to their potential for causing harm if disposed of inappropriately, and in regard to their total quantity. Priority must be assigned to products on the basis of their toxicity, both acute and chronic, and then on the basis of the total quantity of them in the market. For example, expanded polystyrene may not be in need of urgent prioritisation as a toxin, but there is a considerable volume for disposal.

As most people would like to dispose of their waste responsibly but do not know where to take certain sorts of waste, there was a suggestion that an information panel be placed on the outer wrapping telling the buyer what to do with both the packaging and ultimately with the product inside when it is no longer useful. Such an information panel should say more than 'dispose appropriately', which is more in line with cradle to grave good product stewardship.

Part 3 Waste Disposal Levy

Clause 23 Rate of Levy

We agree that imposing a levy is a good way of raising revenue for further waste minimisation work, and that at most landfills in New Zealand there are already charges levied. We do not agree with the rationale that greater cost of waste disposal will necessarily lead to greater recognition of those costs. Many people are likely to see a higher charge as an invitation to dump their waste in out of the way places, which may subsequently lead to pollution of waterways or stock poisoning. However, most respondents agreed that a levy of \$10 per tonne is not unreasonable considering the many administrative and management functions of local bodies that this revenue is intended to cover.

Some respondents suggested that the levy start a little lower and be raised progressively if it seems necessary to have more money available to carry out the proposed waste minimisation activities.

One respondent suggested that in order to minimise the likelihood of illegal dumping if the levy is high, "green" and recyclable waste be allowed free entry into landfill facilities, for removal and processing by companies devoted to that business. If the levy only applied to non-recyclable materials people would be encouraged to sort their waste carefully, with better recovery of useful materials as a result.

Part 6 Reporting and audits

Clause 76 Regulation in relation to records, information and reports

All respondents agreed that for the reasons cited in Paragraph 76 (1) (b), record keeping is an important part of managing a disposal facility, allowing an accurate assessment of how much and what types of waste materials are being disposed of, and measurement of changes in

amount and type of waste over time. Some authorities already require local disposal facilities to maintain records of what passes through their gates.

Facilities for recycling and disposal of waste must be required to maintain high standards and comply with international best practice, while checks and balances are an integral part of a credible Product Stewardship programme. Final destinations of products must be monitored and checked regularly so that we know our waste products are not causing an environmental problem somewhere else. There could be a sunset clause in the legislation that will allow record keeping to be reduced when all the trends have become clear and a waste minimisation and resource recovery mentality has become entrenched in New Zealand society.

One respondent from a rural area made the point that local facility operators should try to build up a relationship with those who use the facility, in order to help them better manage their waste and to educate them in best practice. If the inhabitants of a district share a belief that compliance leads to good outcomes for everybody, then those who dispose of waste of whatever type and in whatever quantity will cooperate safely and hygienically in that disposal. Our members perceived that in rural areas, lifestyle landowners, part-time and hobby farmers often mismanage waste disposal through ignorance of what is best practice or permissible, and education programmes could be run for them by way of the facility owner/operators.

NCWZN has been advocating since 1989 for programmes to educate both manufacturers and consumers on the need for recycling of waste and the reduction of the amount of packaging used.

Part 7 Waste Advisory Board

Clause 79 Establishment of Waste Advisory Board

Most respondents believe that a Waste Advisory Board would be a useful body for providing advice to the Minister, and for liaising with the stakeholder community of which each member is representative. One respondent suggested that the Board have a regulatory as well as an advisory capacity, in order to exercise some control over those whose functions it advises on, and to provide a nationally integrated and coordinated framework for waste management. Another respondent remarked that a Board would be a better body than an Authority for carrying out the task of directing waste management as it would involve less bureaucracy and less expense.

Terms of Reference need to be carefully considered and designed to fit within existing structures relating to managing waste. NCWZN notes that the Minister may vary the terms of reference at any time, but believes that variations should be made in consultation with the Board.

Some of the clauses within the terms of reference could be:

- to strengthen existing structures;
- to encourage consistent standards;
- to reward innovation and sponsor good ideas;
- to foster cooperation between industries and among territorial, regional and unitary authorities;
- to define best practice;
- to oversee the accreditation of qualified practitioners; and
- to be a mouthpiece for sound information.

NCWZN agrees that the suggested number of members, between 4 and 8, seems about right, but we hope to see representatives drawn from as wide a spectrum as possible within the limits of the number. This would ensure fair consideration of the rights and responsibilities of all who are participants in waste disposal and management.

One respondent remarked that the job of an advisory board is to encourage consistent policies and innovative practices. This could be done by constant attention to methods used successfully in other countries, as well as by encouraging innovative thought amongst local waste managers. However, if practices are working well already, the Board should heed this and not make unnecessary changes, nor divert funding from what is already established and working successfully.

Conclusion

NCWNZ has considered only a small number of the proposed amendments to the original Bill, but in areas where we think we can offer some useful information. NCWNZ believes that measures to strengthen the ability of local authorities to manage waste efficiently and to embrace resource recovery practices are urgently needed. Our growing addiction to consumerism is leading to greater quantities and varieties of products that must eventually be disposed.

We believe that change can be brought about through a combination of education, information and economic instruments, with incentives and penalties to encourage desirable behaviour.



Christine Low
National President

Elizabeth Lee
Environment Standing Committee